

**FILED**

**SEP 21 2022**

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DWAUNDRE K. VALLEY,

Defendant.

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No.

**4:22CR521-SRC/SPM**

**INDICTMENT**

The Grand Jury charges that:

**INTRODUCTION**

At all times material to this Indictment, unless otherwise specified below:

1. Defendant DWAUNDRE K. VALLEY was a resident of Bridgeton, Missouri, within the Eastern District of Missouri.

2. The United States Postal Service (“USPS”) is an independent agency of the United States, charged with providing postal service throughout the United States. As part of its responsibility to provide postal service, USPS maintained secure, publicly accessible collection boxes for the deposit of mail to be delivered by USPS. USPS collection boxes were outfitted with locks that were opened with a USPS-issued master key, also known as an “arrow key.”

3. As part of its responsibility to provide postal service, USPS also employed postal carriers to pick up and deliver U.S. mail. USPS issued arrow keys to postal carriers. The duties of postal carriers, included, among other duties, maintaining custody of arrow keys and using arrow keys to open USPS collection boxes and pick up mail deposited into these collection boxes, for said mail to be delivered by USPS.

4. Individual R.N. was a postal carrier employed by USPS and was a public official as defined in Title 18, United States Code, Section 201(a)(1).

5. Individual S.P. was postal carrier employed by USPS and was a public official as defined in Title 18, United States Code, Section 201(a)(1).

6. Individual J.R. was a postal carrier employed by USPS and was a public official as defined in Title 18, United States Code, Section 201(a)(1).

**COUNT I**  
**Bribery of a Public Official (18 U.S.C. §§ 201(b)(1)(A) and (C))**

7. Paragraphs 1 through 6 are realleged and incorporated by reference as if fully set forth herein.

8. On or about March 4, 2022, in St. Ann, Missouri, in the Eastern District of Missouri, the defendant,

**DWAUNDRE K. VALLEY,**

did, directly and indirectly, corruptly give, offer, and promise a thing of value to a public official, namely, Individual R.N., with intent to influence an official act and with intent to induce a public official to do an act or omit to do an act in violation of his or her official duty, that is, offer to provide money to Individual R.N. in exchange for the arrow key issued by USPS to Individual R.N.

In violation of Title 18, United States Code, Section 201(b)(1)(A) and (C).

**COUNT II**  
**Bribery of a Public Official (18 U.S.C. §§ 201(b)(1)(A) and (C))**

9. Paragraphs 1 through 6 are realleged and incorporated by reference as if fully set forth herein.

10. On or about April 15, 2022, in Florissant, Missouri, in the Eastern District of Missouri, the defendant,

**DWAUNDRE K. VALLEY,**

did, directly and indirectly, corruptly give, offer, and promise a thing of value to a public official, namely, Individual S.P., with intent to influence an official act and with intent to induce a public

official to do an act or omit to do an act in violation of his or her official duty, that is, offer money to Individual S.P. in exchange for the arrow key issued by USPS to Individual S.P.

In violation of Title 18, United States Code, Section 201(b)(1)(A) and (C).

**COUNT III**

**Bribery of a Public Official (18 U.S.C. §§ 201(b)(1)(A) and (C))**

11. Paragraphs 1 through 6 are realleged and incorporated by reference as if fully set forth herein

12. On or about April 20, 2022, in Maryland Heights, Missouri, in the Eastern District of Missouri, the defendant,

**DWAUNDRE K. VALLEY,**

did, directly and indirectly, corruptly give, offer, and promise a thing of value to a public official, namely, Individual J.R., with intent to influence an official act and with intent to induce a public official to do an act or omit to do an act in violation of his or her official duty, that is, offer money to Individual J.R. in exchange for the arrow key issued by USPS to Individual J.R.

In violation of Title 18, United States Code, Section 201(b)(1)(A) and (C).

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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JONATHAN A. CLOW, #68003MO  
Assistant United States Attorney